

EXHIBIT B



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-310-JRG

**COMMSCOPE’S FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
PLAINTIFF’S FIRST SET OF INTERROGATORIES (NOS. 1–18)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendants CommScope Holding Company, Inc., CommScope, Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC (collectively, “CommScope” or “Defendants”) hereby state their Objections and Responses to Plaintiff TQ Delta’s First Set of Interrogatories to the CommScope Defendants (Nos. 1–18) (“Interrogatories”).

PRELIMINARY STATEMENT

These objections and responses are made based on CommScope’s present knowledge, information, and belief, and based on CommScope’s understanding of the case as set forth in Plaintiff’s Complaint. This case is still at its early stages, and discovery has recently commenced. Thus, CommScope reserves the right to amend or supplement these Responses in accordance with CommScope’s obligations under the Federal Rules of Civil Procedure. CommScope does not waive or intend to waive any objections that it may have regarding the use

fully herein. CommScope objects to this Interrogatory on the grounds that it is compound and improperly includes multiple subparts. Subject to, and without waiving, its Specific and General Objections, and based on CommScope's current understanding of the information sought by this Interrogatory and CommScope's current understanding of the facts of this case, CommScope responds as follows: Pursuant to Federal Rule of Civil Procedure 33(d), CommScope identifies the following documents: COMMScope017856 – COMMScope017857.

Pursuant to Federal Rule of Civil Procedure 26(e)(1), CommScope reserves the right to revise or supplement this response as necessary.

INTERROGATORY NO. 8:

For each Accused Product, identify the manufacturer, product name, and model number of the components, including semiconductor chip(s), that provide, enable, or embody operation in accordance with one or more of the DSL Standards; and include in your response an identification of the documents and things relating to, referring to, and/or involving the same and an identification of the person(s) employed by or within CommScope (other than legal counsel) most knowledgeable regarding the same.

AMENDED RESPONSE TO INTERROGATORY NO. 8:

CommScope restates each of the General Objections as set forth fully herein. CommScope objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant to other parties' claims or defenses because, among other things of the overly broad definition of the term "Accused Product."

Subject to, and without waiving, its Specific and General Objections, and based on CommScope's current understanding of the information sought by this Interrogatory and CommScope's current understanding of the facts of this case, CommScope responds as follows:

Accused Product	DSL Chipset
5168N vDSL Gateway	[REDACTED]
5168NV vDSL Gateway	[REDACTED]
5268AC vDSL Gateway	[REDACTED]
ARRIS 3360	[REDACTED]
BGW210-700	[REDACTED]
FST1000 G.fast Bridge Modem (SFP Module), phone	[REDACTED]
FST1002 G.fast Bridge Modem (SFP Module), coax	[REDACTED]
FST1203 G.fast Bridge Modem (Wall / Desk Mount), phone, coax	
FST1305 G.fast Bridge Modem (Wall / Desk Mount) VDSL2 35b, phone, coax	[REDACTED]
GA2305 GA2305 xDSL Gateway	[REDACTED]
GA4305 GA4305 xDSL Voice Gateway	[REDACTED]
GVT V5471 vDSL IAD Gateway	[REDACTED]
GZ5NVG3XXX	
NG764x xDSL Gateway CPE	
NM55 Bonded vDSL2 Business Modem	[REDACTED]
NVG34x Series xDSL Gateway	[REDACTED]
NVG3XX	
NVG448X	[REDACTED]
NVG44X NVG44x xDSL Voice Gateway	[REDACTED]
NVG46X NVG46x Ethernet Voice Gateways	[REDACTED]

Accused Product	DSL Chipset
NVG510	[REDACTED]
NVG589	[REDACTED]
NVG599 Triple Play Residential Modem	[REDACTED]
Pace 4111N aDSL Gateway	[REDACTED]
Pace 5031NV vDSL Gateway	[REDACTED]
Pace GA2305 aDSL Gateway	
Pace GA4305 aDSL Gateway	
Pace GV2305 vDSL2 Gateway	[REDACTED]
Pace GV4305 vDSL2 Gateway	[REDACTED]
Pace GV5705 vDSL2 Gateway	[REDACTED]
Pace GV5707 vDSL2 Gateway	[REDACTED]

Persons with knowledge of this subject matter include Benjamin Miller, Paul Baker, and Mark Smorenburg.

Pursuant to Federal Rule of Civil Procedure 26(e)(1), CommScope reserves the right to revise or supplement this response as necessary.

INTERROGATORY NO. 9:

State whether CommScope contends that any of TQ Delta's Asserted Patents are licensed or exhausted with respect to any of the Accused Products and, if so, identify to which patent(s) and Accused Product(s) such license or exhaustion applies, and explain the complete basis for such contention, including without limitation an identification by at least name and model number of any third-party component of the Accused Product that is asserted to be licensed under any Patents-in-Suit.

CommScope's current understanding of the information sought by this Interrogatory and
CommScope's current understanding of the facts of this case, CommScope responds as follows:

A person of ordinary skill in the art at the time of the alleged inventions described in the
Asserted Patents would have possessed a bachelor's degree in electrical or computer
engineering, or the equivalent, and at least 5–6 years of experience; a master's degree in
electrical or computer engineering, or the equivalent, and at least 2–3 years of experience; or a
Ph.D in electrical or computer engineering, or the equivalent, with at least 1–2 years of
experience.

Pursuant to Federal Rule of Civil Procedure 26(e)(1), CommScope reserves the right to
revise or supplement this response as necessary.

Dated this 10th day of June, 2022

Respectfully submitted,

By: /s/ Eric H. Findlay
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Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on this 10th day of June, 2022, all counsel of record are being served with a copy of this document via electronic mail.

/s/ Eric H. Findlay
Eric H. Findlay